

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

NEW HAMPSHIRE INSURANCE COMPANY,) Plaintiff,) v.) GAYLE HILL, et al.,) Defendants.))	CASE NUMBER 11-414
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DEFENDANT'S INITIAL DISCLOSURES

Comes now the Defendant, **GAYLE HILL**, by and through her undersigned counsel, pursuant to Federal Rules of Civil Procedure 26(a)(1), and makes the following initial disclosures:

1. The name and, if known, the address of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings identifying the subjects of the information:

- a. Gail Hill, 9017 Navarre Parkway, Navarre, Florida 32566
- b. Steven Hill, 9017 Navarre Parkway, Navarre, Florida 32566
- c. Plaintiff New Hampshire Insurance Companies, its agents and employees,

who defendant believes would have knowledge of plaintiff's contractual obligations

2. A copy, or a description by category and location, of all documents in the possession of defendant Gail Hill which may be used to support claims or defenses:

- a. John Venn, Garden Street, Pensacola, Florida, bankruptcy trustee for Leisure

Tyme has all of the documents.

a. Voluminous records were produced by defendant Gail Hill in the underlying action. Copies of those documents are not in the possession of defendant Gail Hill.

3. Defendant Gail Hill makes no counterclaim for damages in this or the underlying action .

Defendant Gail Hill reserves the right to supplement these responses.

/s/ James Parrish Coleman
James Parrish Coleman

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on below listed by electronic filing, or U.S. Mail this 5th day of December, 2011.

John W. Dodson
Michelle L. Crunk
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Earl P. Undersood
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/s/ James Parrish Coleman
James Parrish Coleman